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**TELEPHONE CONVERSATIONS TAYLOR/HPM AND CRO**(Last Updated: 2-15-06) RS

On March 18, 2004, Ms. Jessica Davis, attorney at Luper, Neidenthal, & Logan, called D. Crandall, DERR, CDO to inquire about management of wastes at the former HPM plant in Mt. Gilead, OH. Crandall forwarded her telephone number to me and asked that I call her. I called Davis on this same day and she informed me that Taylor Industrial Services, (FKA) HPM had not been paying any rent for some time now (~ December 2003) and had vacated the premises in January 2004. She said there were a bunch of product, equipment, and waste left at the facility by Taylor. She said she was going to have the Morrow County Sheriff place these materials and wastes into the street so the property could be sold. She said her firm was acting as a bankruptcy trustee for the HPM estate. I told her that the products/wastes should not be placed into the streets and believed that the facility would be subject to the Cessation of Regulated Operations (CRO) program requirements. She indicated she was not aware of these requirements. I read her the general rule citations and said I would send her the specific information and paperwork requirements. I also gave her the DHWM web address for her use. Ms. Davis' office telephone number is 614-229-4427. On this same day I called J. Beattie, DAPC, CO to inquire if Taylor had filed Right-to-Know documents and would therefore be subject to CRO. Beattie said chemical inventory forms had been filed for the previous years by Taylor. I then called R. McGinnis, DHWM, CO to see if any CRO forms had been filed with OEPA, and McGinnis said he had not received any of these forms.

On March 19, 2004, I sent Jessica Davis all of the pertinent CRO information and filing forms.

On May 17, 2004, I called J. Davis to check on the status of the former HPM plant and any subsequent filing of CRO forms. She told me that she was leaving the firm, and she would have the new assigned attorney call me.

On May 20, 2004, I called J. Davis to see who the new attorney was because I had not yet received a call from the new attorney. She said the attorney was Fred Luper and he could be reached at telephone number 614-221-7663. She said she would give the file to Luper and he would be in contact with me.

On July 1, 2004, I called F. Luper to check on the status of the plant and filings. He said he had little to no knowledge of the situation and would look for my letter of March 19, 2004, and upon reading it, would give me a call.

On July 13, 2004, I again called F. Luper. I left him a message asking him to call me as I wanted to go to the facility for a walk-through and/or inspection. On this same day Luper's assistant, Ms. Johna, called to let me know the property had been sold, Luper could not grant me access, and asked that I call Ms. Sara Daneman, attorney/HPM trustee,

at 614-337-0960 for current information. I called Ms. Daneman on this day and she told me that both of the HPM properties had been sold. She said the larger property had been sold in October 2003 and the smaller one in April 2004. I told her my concerns with any wastes/products left in the vacated building(s) in conjunction with the CRO requirements. She said that Taylor was responsible for getting rid of the product/waste materials and equipment. She told me that Mid-Ohio Recycling had purchased the properties and that Mr. Earl Linder was the facility contact. She said he could be reached at telephone number 419-295-4073. I then called Mr. Linder. He said Taylor had been evicted for non-payment of rent and that equipment, products, and wastes remained at the facility(s). He said some of the used oils had been removed by a company out of Mt. Vernon, Ohio and that the buildings looked like a ghost town. He said they had been trying to get Taylor to remove these things but was getting no response/actions from them. I told him that I would like to review the buildings and contents and scheduled to meet with him in Mt. Gilead on July 15, 2004 at 10:00 AM.

On July 15, 2004, it was verified that only the Lincoln Avenue, Plant 1 facility had been vacated. The Marion Road, Plant 2 facility was still in operation by Taylor Industrial Services. Mid-Ohio Recycling only purchased Plant 1.

On July 27, 2004, I spoke to R. McGinnis about the HPM situation. It was agreed that a single NOV letter to all 3 entities(i.e., HPM estate attorney, Taylor Industrial Services, Mid-Ohio Recycling) would be sent. The NOV would cite both RCRA and CRO violations. I then spoke to L. Adelsberger and he agreed with the proposed procedure. On this same day I called S. Daneman and her assistant gave me the appropriate address to send the HPM associated documents (62 Mill Street, Gahanna, Ohio 43230).

On September 1, 2004, attorney Sarah Lynn, representing TIS, called and indicated she had just received the NOV. She said she would like an extension to the time frame indicated in the NOV for receipt of a response. She said the response would be submitted to Ohio EPA by early October. I returned the call to Ms. Lynn and left her a message. I said that formal extensions for something like this were not actually issued and that I awaited her response. I then called J. Schierberl to let him know about the current situation with this facility and he said to keep him informed, especially as to the contents of the response from Ms. Lynn.

On September 23, 2004, I noticed that the August 4, 2004 NOV indicated that the facility visit took place on July 17, 2004. As this was a Saturday, I checked my records and found them to indicate that the visit actually took place on Thursday, July 15, 2004. I noted the CDO file copy and called T. McConnell so the DHWM tracking system could be updated. McConnell said she would take care of the update.

On October 4, 2004, P. Farnlacher, DSIWM, CDO informed me that S. Lynn had left him a message that her response was going to take longer to prepare than earlier stated.

On October 5, 2004, I spoke to S. Lynn and she indicated that based on her conversations with Taylor Industries personnel, they had not filed any SERC reports for the Lincoln Ave.

facility and had not actually conducted any industrial/manufacturing operations at the facility. I told her it had been reported to me that documented information of filed SERC reports for the HPM Lincoln Ave. facility were filed in 2000 and 2001. I told her previous telephone calls from and associated documentation sent to Taylor Industries personnel indicated business was being conducted by Taylor Industries at the Lincoln Ave. facility, and other OEPA Division's inspection forms that indicated Taylor was conducting industrial/manufacturing operations at the Lincoln Avenue facility. I told her I had several photographs that were taken at the facility of various containers of wastes/products left at the facility. She indicated she would check into all further and asked for copies of all of this information. I told her the SERC reports would have to come from CO, but I would get them and all else to her ASAP.

On October 8, I spoke to S. Lynn and she indicated she would like actual copies of the photographs taken during the facility review. I told her I would print them and send them to her.

On December 13, 2004, I called Mid-Ohio Recycling and left a message for E. Linder to return my call. Mr. Linder called me back and told me that Taylor Industries personnel and a waste company representative were supposed to be at the site the following day to review and evaluate the containers of waste/products left at the facility. He said he would keep me informed of the situation.

On January 26, 2005, I called Mid-Ohio Recycling and spoke to Randy at the facility. He said nothing had been done with the wastes/products left in the containers. He said Taylor personnel had recently been to the facility and began to mark pieces of equipment they were going to take. He said he told the Taylor Industries personnel that they would not be allowed to take any more equipment until the wastes/products had been properly managed. He said the Taylor Industries personnel were told that they had until the end of the month to begin the removal of the wastes/products, and if not, Mid-Ohio Recycling was going to sell the remaining equipment and pay for the removal out of the proceeds. He said they would keep me informed of the situation.

On February 1, 2006, I called Al Linder of Mid-Ohio S&R and left a message that Ohio EPA CDO staff would be at the former HPM #1 facility on this day to review the site.